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Page 1
                                                                                                               Page 3
            IN THE UNITED STATES DISTRICT COURT
                                                                                INDEX
               DISTRICT OF NEBRASKA
                                                                     EXAMINATION:
                                                                2
                                                                                     DIRECT CROSS REDIRECT RECROSS
                                                                     JON HANSEN
      LISSETTE LARIOS ROOHBAKHSH, as )
                                                                     By Mr. Gould:
                                                                4
      personal representative of the
                                                                5
      ESTATE OF FATIMA LISSETTE LARIOS )
                                                                               EXHIBITS
                                                                6
      and on behalf of next of kin, ) Case No.
                                                                7
                       ) 8:17-cv-00031-
                                                                            Pg. Ref.
                                                                     Ex.
                        ) JFB-CRZ
              and
                                                                8
                                                                     No.
                                                                            No.
                                                                                   Description
      NELSON LARIOS, as next of kin )
                                                                     Hansen 1 7
                                                                                    Chadron State College
                                                                                 Sexual Assault
              Plaintiffs,
                                                               10
                                                                                Sex Harassment
                                                                                Domestic/Relationship Violence
                                                               11
                                                                                      Policy 3020
                                                                     Hansen 2A 10
      BOARD OF TRUSTÉES OF THE NEBRASKA)
                                                               12
      STATE COLLEGES
                                                                     Hansen 2B 10
                                                                                     Policy 3020
              and
                                                               13
                        ) TAKEN IN BEHALF
                                                                     Hansen 2C 10
                                                                                     Policy 3020
      CHADRON STATE COLLEGE,
                                       ) OF THE
                                                               14
                       ) PLAINTIFFS
                                                                     Hansen 3 7
                                                                                    November 7, 2014, Email
              Defendants.
                                                               15
                                                                                    Title IX "Designee" Training
                                                                     Hansen 4 7
                                                               16
                                                                                for CSC
                                                               17
                                                                     Hansen 5 8
                                                                                    Handwritten Notes
                                                               18
                                                                     Hansen 6 88
                                                                                     Project Strive/TRIO Memo
                                                               19
                                                               20
                                                               21
                                                                           Exhibits Previously Marked
           DEPOSITION OF JON HANSEN, taken at
                                                               22
                                                                     Gurrola 3 78
      9:56 a.m. on April 4, 2018, by Rachel McMenamin, CSR,
                                                                     Gurrola 5 68
                                                               23
      RPR and General Notary Public in and for the State of
                                                                     Plf's 4 33
                                                               24
      Nebraska, at 1500 Woodmen Tower, 1700 Farnam Street,
      Omaha, Nebraska.
                                                               25
                                                Page 2
                                                                                                               Page 4
 1
        APPEARANCES:
                                                                 1
                                                                                CERTIFICATION BY NOTARY
 2
        Mr. Martin D. Gould
                                       For Plaintiffs
                                                                 3
 3
        Attorney at Law
                                                                 4
                                                                             I, Rachel McMenamin, General Notary Public,
        ROMANUCCI & BLANDIN, LLC
                                                                 5
                                                                       do hereby certify that I served as the Court Reporter
 4
        321 North Clark Street, Suite 900
                                                                 6
                                                                       at the deposition of Jon Hansen on April 4, 2018, at
        Chicago, IL 60654
 5
                                                                 7
                                                                       1500 Woodmen Tower, 1700 Farnam Street, Omaha,
 6
        Mr. Thomas E. Johnson
                                         For Defendants
                                                                 8
                                                                       Nebraska, and that the following questions were asked
        Attorney at Law
                                                                 9
                                                                       and witness refused to answer same:
 7
        BAIRD HOLM LAW FIRM
                                                               10
        1500 Woodmen Tower
                                                               11
 8
        1700 Farnam Street
        Omaha, NE 68102
                                                               12
                                                                                Page 14, Line 19
 9
                                                               13
10
        ALSO PRESENT: Kimberly Brown
                                                               14
11
                                                               15
12
                                                               16
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15
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                                                                                       GENERAL NOTARY PUBLIC
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1 (Pages 1 to 4)

THIBAULT, SUHR & THIBAULT, INC. Omaha, Nebraska (402) 331-2500

EXHIBIT

DIRECT - HANSEN (Gould)

	Page 5		Page 7
1	JON HANSEN	1	Chadron State College?
2	Of lawful age, being first	2	A In this capacity, I have been employed by
	duly cautioned and solemnly	3	Chadron State College since February of 2013. I
3	sworn as hereinafter certified,	4	believe it's February 18.
	was examined and testified as	5	Q In preparation for this deposition, did
4	follows:	6	you review any documents?
5	DIRECT EXAMINATION	7	A Yes.
6	BY MR. GOULD:	8	O What documents?
7	Q Can you please state and spell your full	9	MR. JOHNSON: We'll give you copies. Do
8	name for the record?	10	you have those copies?
9 10	A Jon Paul Hansen.	11	MS. BROWN: I have four copies of each of
11	Q Have you ever given a deposition before?A No, sir.	12	them, Marty, so
12	Q Before we start, I'm going to go over the	13	MR. GOULD: Okay.
13	rules of the deposition so we're all on the same	14	MS. BROWN: if you want to enter them
14	page here. I'm going to be asking you a number of	15	in and then
15	questions. If you do not understand my question,	16	
16	you need to tell me. Otherwise, I'm going to assume		MR. GOULD: We'll mark these.
17	that you understood the question and you answered	17	MR. JOHNSON: Why don't you go ahead and
18	truthfully and to the best of your ability, sound	18	give him two copies of each so he can mark one as an
19	fair?	19	exhibit.
20	A Yes, sir.	20	MS. BROWN: There you go.
21	Q Throughout the deposition, we may be	21	MR. JOHNSON: Okay.
22	become conversational. I need you to give verbal	22	MS. BROWN: And then I'll start another
23	responses, yes, no answers. No huh-uhs, uh-huhs.	23	stack.
24	That's for the court reporter's sake so the record	24	MR. GOULD: All right. So I'm going to
25	is clear, okay?	25	mark this Chadron State College, Sexual Assault,
	Page 6		Page 8
1	A Yes, sir.	1	Sexual Harassment, and Domestic/Relationship
2	Q Can we agree on that?	2	Violence PowerPoint as Hansen Exhibit 1.
3	A Yes, sir.	3	(Hansen Exhibit Number 1 was marked for
4	Q Let me finish asking my question before	4	identification.)
5	you answer, and I'll wait for you to answer before I	5	MR. GOULD: I'm going to mark Policy 3020
6	ask my next question, okay?	6	as Hansen Exhibit 2.
7	A Yes, sir.	7	(Hansen Exhibit Number 2 was marked for
8	Q Bathroom breaks, you can take them. The	8	identification.)
9	only rule is that if I have a question pending, you	9	MR. GOULD: I'm going to mark an email
10	have to answer the question first before you take a	10	from Shelley Dunbar to Jon Hansen, Joel Smith,
11	break. Can we agree on that?	11	cc'ing Kristin Petersen on November 7, 2014, as
12	A Yes.	12	Hansen Exhibit 3.
		13	(Hansen Exhibit Number 3 was marked for
1 7 7		1 10	(Hansen Eathor Fullion 2 was marked 101
13 14		1.4	
14	your last name for the record?	14	identification.)
14 15	your last name for the record? A Hansen. H-a-n-s-e-n.	15	identification.) MR. GOULD: I'm going to mark the
14 15 16	your last name for the record? A Hansen. H-a-n-s-e-n. Q How old are you, sir?	15 16	identification.) MR. GOULD: I'm going to mark the Title IX "Designee" Training for CSC as Hansen
14 15 16 17	your last name for the record? A Hansen. H-a-n-s-e-n. Q How old are you, sir? A Forty-nine.	15 16 17	identification.) MR. GOULD: I'm going to mark the Title IX "Designee" Training for CSC as Hansen Exhibit 4.
14 15 16 17 18	your last name for the record? A Hansen. H-a-n-s-e-n. Q How old are you, sir? A Forty-nine. Q Are you currently employed?	15 16 17 18	identification.) MR. GOULD: I'm going to mark the Title IX "Designee" Training for CSC as Hansen Exhibit 4. (Hansen Exhibit Number 4 was marked for
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14 15 16 17 18 19 20 21 22	your last name for the record? A Hansen. H-a-n-s-e-n. Q How old are you, sir? A Forty-nine. Q Are you currently employed? A Yes. Q Where do you work? A Chadron State College. Q And what's your job title?	15 16 17 18 19 20 21 22	identification.) MR. GOULD: I'm going to mark the Title IX "Designee" Training for CSC as Hansen Exhibit 4. (Hansen Exhibit Number 4 was marked for identification.) BY MR. GOULD: Q Mr. Hansen, can you tell me, what is this document here?

DIRECT - HANSEN (Gould)

	Page 125		Page 127
1		1	CERTIFICATE
1 2	MR. JOHNSON: Object to the form of the question.	2	STATE OF NEBRASKA)
3	A I I don't know.) ss.
4	Q Okay. Well, in terms of Chadron State	3	COUNTY OF DOUGLAS)
5	College, you believe they they couldn't have done	4	I, Rachel McMenamin, General Notary Public
6	anything else about it; is that right?	5	in and for the State of Nebraska, do hereby certify
7	MR. JOHNSON: Object, form of the	6	that JON HANSEN was by me duly sworn to testify the
8	question, asked and answered.	7 8	truth, the whole truth and nothing but the truth, and
9	A I don't know that there's anything that we	9	that the deposition by him as above set forth was reduced to writing by me.
10	could have done that would have would have	10	That the within and foregoing deposition
11	changed this situation. We could have made it	11	was taken by me at the time and place herein
12	better. We could have made it worse. It could have	12	specified and in accordance with the within
13	been the same. I don't know.	13	stipulations, the reading and signing of the witness
14	MR. GOULD: No further questions.	14	to his deposition having not been waived.
15	MR. JOHNSON: We'll read and sign. We'll	15	That I am not counsel, attorney or relative
16	start the next deposition at 2 o'clock.	16	of either party or otherwise interested in the event
17	(The deposition was concluded at	17 18	of this suit. IN TESTIMONY WHEREOF, I have placed my hand
18	12:54 p.m.)	19	and notarial seal this 11th day of April, 2018.
19	12.54 p.m.)	20	and notatian scar and 11th day of 14pm, 2010.
20		21	
21			GENERAL NOTARY PUBLIC
22		22	
23			COST: \$
24		23	
25		24	
23		25	
	Page 126		Page 128
1	JURAT	1	IN THE UNITED STATES DISTRICT COURT
2		2	DISTRICT OF NEBRASKA
3 4	I, JON HANSEN, do hereby state under oath	3	LISSETTE LARIOS ROOHBAKHSH, as) personal representative of the)
5	that I have read the above and foregoing deposition	1	ESTATE OF FATIMA LISSETTE LARIOS)
	in its entirety and that the same is a full true	1 4	
6	in its entirety and that the same is a full, true, and correct transcription, with my noted corrections,	4	and on behalf of next of kin,) Case No. and) 8:17-cv-00031-
7	and correct transcription, with my noted corrections, if any, of my testimony so given at said time and	5	and on behalf of next of kin,) Case No.
7	and correct transcription, with my noted corrections,		and on behalf of next of kin,) Case No. and) 8:17-cv-00031- NELSON LARIOS, as next of kin) JFB-CRZ Plaintiffs,) v.)
7 8 9	and correct transcription, with my noted corrections, if any, of my testimony so given at said time and	5	and on behalf of next of kin,) Case No. and) 8:17-cv-00031- NELSON LARIOS, as next of kin) JFB-CRZ Plaintiffs,) v.) BOARD OF TRUSTEES OF THE NEBRASKA) STATE COLLEGES)
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7 8 9	and correct transcription, with my noted corrections, if any, of my testimony so given at said time and	5 6 7	and on behalf of next of kin,) Case No. and) 8:17-cv-00031- NELSON LARIOS, as next of kin) JFB-CRZ Plaintiffs,) v. BOARD OF TRUSTEES OF THE NEBRASKA) STATE COLLEGES) and) CERTIFICATE
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7 8 9 10 11 12	and correct transcription, with my noted corrections, if any, of my testimony so given at said time and place. (Deponent's Signature) (Date)	5 6 7 8 9 10	and on behalf of next of kin,) Case No. and) 8:17-cv-00031- NELSON LARIOS, as next of kin) JFB-CRZ Plaintiffs,) V. BOARD OF TRUSTEES OF THE NEBRASKA) STATE COLLEGES and) CERTIFICATE CHADRON STATE COLLEGE,) OF REPORTER Defendants.) I, Rachel McMenamin, General Notary Public, do hereby certify that I served as the Court Reporter at the deposition of JON HANSEN on April 4, 2018, at 1500 Woodmen Tower, 1700 Farnam Street, Omaha, Nebraska, in which the costs of reporting and
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	and correct transcription, with my noted corrections, if any, of my testimony so given at said time and place. (Deponent's Signature) (Date) STATE OF NEBRASKA)) ss. COUNTY OF DOUGLAS) Subscribed and sworn to before me on this	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	and on behalf of next of kin,) Case No. and) 8:17-cv-00031- NELSON LARIOS, as next of kin) JFB-CRZ Plaintiffs,) v.) BOARD OF TRUSTEES OF THE NEBRASKA) STATE COLLEGES and) CERTIFICATE CHADRON STATE COLLEGE,) OF REPORTER Defendants.) I, Rachel McMenamin, General Notary Public, do hereby certify that I served as the Court Reporter at the deposition of JON HANSEN on April 4, 2018, at 1500 Woodmen Tower, 1700 Farnam Street, Omaha, Nebraska, in which the costs of reporting and transcribing the deposition were \$, and that such costs are to be paid by counsel for the plaintiffs. I further certify that the original and copies were sent to: Original and 1 copy to Mr. Martin D. Gould; 1 copy to Mr. Thomas Johnson. Dated this 11th day of April, 2018. Delivered: GENERAL NOTARY PUBLIC Rachel McMenamin Thibault, Suhr & Thibault, Inc.
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32 (Pages 125 to 128)

	Page 129	
1	April 11, 2018	
2	Mr. Thomas Johnson Attn: JON HANSEN	
3	1500 Woodmen Tower	
4	1700 Farnam Street Omaha, NE 68102	
5	Dear Mr. Hansen:	
6	You will recall on April 4, 2018, I took your deposition at 1500 Woodmen Tower, 1700 Farnam Street,	
7	Omaha, Nebraska dealing with the case of LISSETTE	
8	LARIOS ROOHBAKHSH, as personal representative of the ESTATE OF FATIMA LISSETTE LARIOS and on behalf of	
	next of kin, Plaintiffs v. Board of Trustees of the	
9	Nebraska State Colleges and Chadron State College, Defendants. Your signature on the deposition was not	
10	waived.	
11	The minuscript of the transcript, which is an exact duplicate of the original, is ready for your review.	
12	I would appreciate it if you would read it, then sign	
13	the errata sheet and jurat page and return back to me in the enclosed envelope as soon as possible. You	
14	may keep the minuscript. Local practice allows a witness 30 days in which to read and sign the	
	original and return same to the reporter.	
15	As you read the minuscript, please note any	
16	corrections you might have on the correction sheet	
17	enclosed with the minuscript giving the page number, line number, and the reason for the correction to be	
	made as so indicated on the sheet.	
18	After reading and noting any corrections on the	
19	sheet, please sign the jurat page and also the	
20	correction page. Please sign both pages in front of a Notary Public and then have the Notary sign on the	
0.1	proper line.	
21	Thank you for your cooperation in this matter.	
22		
23	Yours truly,	
24	Rachel McMenamin cc: Mr. Martin D. Gould	
25	Mr. Thomas Johnson	
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	DEPOSITION CORRECTIONS OF JON HANSEN CASE: LARIOS v. BOARD OF TRUSTEES OF THE NEBRASKA STATE COLLEGES, ET AL. Case No. 8:17-cv-00031-JFB-CRZ PAGE LINE REASON FOR NO. NO. CORRECTION CORRECTION	
18		
19	SIGNATURE OF WITNESS	
20	SIGNATURE OF WITNESS STATE OF NEBRASKA)	
20) ss	
21	COUNTY OF DOUGLAS)	
22	Subscribed and sworn to before me this	
	day of, 2017.	
23		
	CENTED AT MOST STATE OF	
24	GENERAL NOTARY PUBLIC	
25		

33 (Pages 129 to 130)

1	JURAT
2	
3	I, JON HANSEN, do hereby state under oath
4	that I have read the above and foregoing deposition
5	in its entirety and that the same is a full, true,
6	and correct transcription, with my noted corrections,
7	if any, of my testimony so given at said time and
8	place.
9	
10	In P Hans
11	(Deponent's Signature)
12	05/09/18
13	(Date)
14	STATE OF MEDDAGUA
15	STATE OF NEBRASKA)) ss.
16	county of bouglas) Dawes
17	Subscribed and sworn to before me on this
18	9 day of May, 2018.
19	
20	
21	1/1 2000.
22	S. Ham Son Stut
23	GENERAL NOTARY PUBLIC
24	General Notary - State of Nebraska STEFANI VAN VLEET
25	My Comm. Exp. June 11, 2018.

1	DEPOSITION CORRECTIONS OF JON HANSEN
2	CASE: LARIOS v. BOARD OF TRUSTEES OF THE NEBRASKA
3	STATE COLLEGES, ET AL. Case No. 8:17-cv-00031-JFB-CRZ
4	PAGE LINE REASON FOR NO. NO. CORRECTION CORRECTION
5	NO. NO. CORRECTION CORRECTION
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17	* * *
18	1 111
19	TONATHOR OF MITNESS
20	SIGNATURE OF WITNESS STATE OF NEBRASKA)
21) ss COUNTY OF DOUGLAS) Dewes
22	GM Subscribed and sworn to before me this day of May , 2018.
23	Hand of John
24	General Notary - State of Nebrask@ENERAL NOTARY PUBLIC STEFANI VAN VLEET
25	My Comm. Exp. June 11, 2018.